

IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF OKLAHOMA

W. A. DREW EDMONDSON, in his)
capacity as ATTORNEY GENERAL)
OF THE STATE OF OKLAHOMA and)
OKLAHOMA SECRETARY OF THE)
ENVIRONMENT C. MILES TOLBERT,)
in his capacity as the)
TRUSTEE FOR NATURAL RESOURCES)
FOR THE STATE OF OKLAHOMA,)
Plaintiffs,)
vs.) 4:05-CV-00329-TCK-SAJ
TYSON FOODS, INC., et al,)
Defendants.)

VOLUME I OF THE DEPOSITION OF
W. A. SAUNDERS, produced as a witness on behalf of
the Plaintiffs in the above styled and numbered
cause, taken on the 23rd day of October, 2006, in
the City of West Siloam Springs, County of Delaware,
State of Oklahoma, before me, Lisa A. Steinmeyer, a
Certified Shorthand Reporter, duly certified under
and by virtue of the laws of the State of Oklahoma.

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A P P E A R A N C E S

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-and-

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I N D E X

W I T N E S S

P A G E

W. A. SAUNDERS

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11:57AM

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1 (Whereupon, the deposition began at
2 12:05 p.m.)

3 W. A. SAUNDERS

4 having first been duly sworn to testify the truth,
5 the whole truth and nothing but the truth, testified
6 as follows:

7 DIRECT EXAMINATION

8 BY MR. GARREN:

9 Q Mr. Saunders, please state your full name to
10 the court.

12:05PM

11 A Woodrow Alfred Saunders, Junior.

12 Q I've handed you what's been marked as
13 Deposition Exhibit No. 3. I'll represent to you
14 that's a copy of the subpoena that was served. Do
15 you remember seeing this document?

12:05PM

16 A I have.

17 Q What I would like to do is go through the list
18 for the attachments and identify what you know to be
19 contained within the documents that you provided to
20 us under that subpoena.

12:06PM

21 MR. McDANIEL: And in anticipation of him
22 giving this answer, just so the Record is clear, I
23 believe we have an agreement that documents that Mr.
24 Saunders has produced, Peterson identified certain
25 of those documents as being confidential for

12:06PM

1 A A couple of years ago I'm assuming. I don't
2 remember exactly, sir.

3 Q What facts or reasons did you have for going
4 into the poultry growing operation business?

5 A To try to make my cow operation work better. 12:38PM

6 Q And how do you mean by that?

7 A By the fertilizer.

8 Q And tell me what --

9 A Poultry litter. I bought a piece of farm land
10 that was very poor, had been cleared, then left to 12:38PM
11 go back to seed, had never been taken care of.

12 Fertility on it was little to none, and I was either
13 going to have to put a tremendous amount of
14 commercial litter on it, commercial fertilizer or
15 poultry litter. With the number of acres I had, I 12:38PM
16 could not afford the commercial. Plus, I was
17 working out and trying to support a cow farm, and
18 the chicken farm gave me a chance to stay at home
19 and make a living and improve my cow farm.

20 Q So you bought it in order to have the waste 12:39PM
21 from the poultry farm?

22 A As well as the income from the poultry farm,
23 sure.

24 Q Had you ever used -- rephrase it. Had you
25 ever applied poultry waste to your farm prior to 12:39PM